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March 2, 2022

VIA ECF

Magistrate Judge Gabriel W. Gorenstein
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

MEMORANDUM ENDORSED

RE: Viju Chacko v. Costco Wholesale Corporation
Docket No.: 1:19-cv-08051-GWG

Dear Judge Gorenstein:

This office represents the Plaintiff, Viju Chacko, in the above captioned matter. This letter is submitted jointly with counsel for the Defendant. The parties respectfully request a thirty (30) day extension of the filing of the Joint Pretrial Order, Trial Memorandum, Voir Dire Questions, Request to Charge, and Proposed Verdict Sheet from March 11, 2022 to April 11, 2022. This is the fifth request for an extension of time to file the Joint Pretrial Order.

The parties are requesting a further extension in order to complete the necessary items noted in Judge Gorenstein's Trial Order from October 22, 2021. The parties are in full cooperation with one another. Plaintiff has provided their first draft of the Joint Pre-Trial Order, Voir Dire Questions, Request to Charge, and Proposed Verdict Sheet, and Defendants still need to turn over their portion to Plaintiff to review and to provide her respective objections. Moreover, Plaintiff is still working on obtaining a portion of the exhibits from her employment, tax records, and medical providers she intends to use at trial.

We have received consent from our adversary to request the extension of time.

Thank you for your attention and consideration of this request.

Very Truly Yours,



Frank M. Rizzo, Esq.

RAPHAELSON & LEVINE LAW FIRM, P.C.

CC:

CONNELL FOLEY LLP (via ECF)

Samuel P. Quatromoni, Esq.

Extension to April 11, 2022, granted.

So Ordered.


GABRIEL W. CORENSTEIN

United States Magistrate Judge

March 3, 2022